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UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

In re:

NEW JERSEY MOTORSPORTS PARK, LLC, *et al.*,

Debtors

Chapter 11

Case No. 11-16752 JHW

Jointly Administered

**MOTION PURSUANT TO SECTION 365(a) OF THE BANKRUPTCY CODE  
FOR AN ORDER AUTHORIZING AND APPROVING THE REJECTION  
OF AN EXECUTORY CONTRACT WITH CIFALOGGIO, INC.**

**PLEASE TAKE NOTICE** that New Jersey Motorsports Park, LLC (“NJMP”), New Jersey Motorsports Park Operating Company, LLC (“Operating”), New Jersey Motorsports Park Urban Renewal, LLC (“Urban Renewal”), and New Jersey Motorsports Park Development Associates, LLC (“Development”) (collectively the “Debtors”) shall move before the Honorable Judith H. Wizmur, United States Bankruptcy Court, Mitchell H. Cohen U.S. Courthouse, 400 Cooper Street, Courtroom 4B, Camden, NJ 08101 on April 25, 2011 at 10:00 a.m. prevailing time, or as soon thereafter as counsel may be heard on their Motion Pursuant to Section 365(a) of the Bankruptcy Code for an order Authorizing and Approving the Rejection of an Executory Contract with Cifaloglio, Inc. (the “Motion”).

The Debtors will rely upon the attached Certification and waive oral argument unless timely opposition is submitted.

As the facts that the Debtors rely upon as set forth in the accompanying Certification and the bases for the Debtors’ request as clearly set forth in the aforesaid "Local Rule" do not present complicated questions of fact or unique questions of law, it is hereby submitted that no brief is necessary to aid the Court in deciding the motion.

Objections should be filed with the Court and served upon the moving party seven (7) days prior to the date of the hearing.

**COHEN, SEGLIAS, PALLAS,  
GREENHALL & FURMAN, P.C.**

/s/ Nella M. Bloom

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Dated: March 24, 2011